

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT
OF PENNSYLVANIA

UNITED STATES OF AMERICA)	
)	
v.)	2:00-cr-44
)	
ROBERT HERESCO,)	
Defendant.)	Hon. Arthur J. Schwab

MOTION TO EXPEDITE HEARING

Defendant Robert Heresco, by and through his undersigned attorney, herewith petitions the Court for an order expediting the probation revocation hearing, and in support thereof, states the following:

1. The Court has scheduled the probation revocation hearing for June 27, 2008.
2. Mr. Heresco's fiancée is scheduled to give birth on or about June 11, 2008.
3. Probation Officer Wendy Brown has indicated to the undersigned that she will recommend that Mr. Heresco be placed on electronic monitoring.
4. While the Court is not bound by that recommendation, if the hearing is expedited, and the Court follows that recommendation, Mr. Heresco would have the opportunity to be present at the birth of his child.
5. The undersigned discussed this matter with Assistant United States Attorney Brendan Conway, and with Officer Brown, and neither has an objection to expediting the matter.
6. Mr. Heresco is in the custody of the United States Marshal and is currently housed at the North East Ohio Correction Center in Youngstown, Ohio.

WHEREFORE, for the reasons set forth above, Defendant Robert Heresco

moves the Court for an order rescheduling the probation revocation hearing in this matter.

Respectfully submitted,

/s/Martha E. Bailor

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